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September 16, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Pamela K. Chen, U.S.D.J.
225 Cadman Plaza East
Courtroom 4F North
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, *et al.*
Case No.: 1:22-cv-1032 (PKC) (JRC)

Dear Judge Chen:

This office, together with Milman Labuda Law Group PLLC, represents the Plaintiff IME WatchDog, Inc. (“Plaintiff”) in the above-referenced case.

Plaintiff writes to respectfully request clarification as to the format of the September 25, 2024 continued hearing in that it is unclear as to whether all parties and participants are required to appear virtually, or just the attorneys and representatives of Giant Partners Inc.

To the extent that the Court requires all parties and participants to appear virtually, Plaintiff respectfully requests that everyone except the attorneys and representatives of Giant Partners be required to appear in person for a couple of reasons.

First, this Court previously required the parties to appear in person in order to conduct an efficient hearing. See Text Only Orders dated March 8, 2024 and May 16, 2024, respectively.

Second, on August 14, 2024, Plaintiff received a response to its subpoena from Subin Associates, LLP (“Subin”). It is respectfully submitted that the production received can clarify some issues of fact and, as such, Plaintiff seeks to examine both Safa Gelardi and Eugene Liddie for approximately fifteen (15) minutes each on the contents of such production. Further, your undersigned respectfully submits that Plaintiff apprised the Court that it would reserve the right to call witnesses upon receipt of Subin’s response, although your undersigned has been unable to confirm this as the parties have not yet received a copy of the transcript from the July 29, 2024 continued hearing.

Based on the foregoing, Plaintiff respectfully requests that all parties, participants, and counsel other than those of Giant Partners be required to appear in person on September 25, 2024.

Plaintiff thanks this Court for its continued time and attention to this case.

Dated: Jamaica, New York
September 16, 2024

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen, Esq.

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.

cc: all counsel of record